

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to:

**Smalls v. Zhejiang Huahai
Pharmaceutical Co., Ltd. et al.
Case No. 1:20-cv-08199-RMB-SAK**

**Garcia v. Zhejiang Huahai
Pharmaceutical Co., Ltd. et al.
Case No. 1:20-cv-07957-RMB-SAK**

**Suits v. Zhejiang Huahai
Pharmaceutical Co., Ltd et al.
Case No. 1:20-cv-06547-RMB-SAK**

**Lee v. Zhejiang Huahai
Pharmaceutical Co., Ltd. et al.
Case No. 1:20-cv-15324-RMB-SAK**

MDL No. 2875

Honorable Renée Marie Bumb,
Chief Judge

**ORDER
ESTABLISHING
AMENDED CASE
MANAGEMENT
SCHEDULE
FOR WAVE 2
BELLWETHER CASES**

The Special Master Having Previously Entered the Order Establishing
Amended Case Management Schedule for Wave 2 Bellwether Cases on May 14,
2025 (ECF No. 3054),

The Parties Having Met and Conferred, to agree upon the second amended case management schedule for the second wave of potential personal injury bellwether plaintiff (“Wave 2 BW”) trials in the following matters:

1. Garcia, Robert – 1:20-cv-07957
2. Lee, Robert – 1:20-cv-15324
3. Smalls, Evon – 1:20-cv-08199
4. Suits, James – 1:20-cv-06547

Having Reviewed the proposed, agreed-upon, second amended schedule,

IT IS ORDERED: the deadlines for the four above matters previously established in ECF No. 3054 and ECF 2988 are amended and the deadlines for the four above matters are:

Wave 2 BW Trial Event	Wave 2 BW Trial Date
Deadline to amend Plaintiff Fact Sheet	3/14/2025
Close of case-specific fact discovery	6/23/2025
Deadline for Plaintiff to designate experts and serve expert report(s)	6/30/2025
Deadline for Defendants to designate experts and serve expert report(s)	8/15/2025
Depositions of experts	8/15/2025 – 9/19/2025
Close of expert discovery	9/19/2025
Deadline for parties to exchange deposition designations	9/30/2025 (Completion of rolling exchange)
Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions	10/8/2025

Deadline to submit deposition designations, objections, and counter-designations to the Court	10/27/2025
Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions	11/10/2025
Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions	11/24/2025
Parties to submit (joint or separate if no agreement) position statement(s) to Court on proposed selection of Wave 2 bellwether trial case	3 business days after the Court's ruling on Rule 702/MSJs
Deadline to file motions in limine	12/15/2025*
Deadline to file oppositions to motions in limine	1/12/2025*
Deadline to submit joint final pretrial order	1/15/2025*

* Dates to be adjusted pending Court's identification of trial start date

June 16, 2025

/s/ Thomas I. Vanaskie
Hon. Thomas I. Vanaskie (Ret.)
Special Master